

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

RACHEL CRAWFORD,	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. A-09-CA-649-LY
	§	
SAN MARCOS CISD	§	
Defendant.	§	

**STIPULATION OF DISMISSAL WITH PREJUDICE**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COME Plaintiff and Defendant pursuant to FED. R. CIV. P. 41(a)(1)(A)(ii) and file this Stipulation of Dismissal with Prejudice of the above-styled and referenced action, and all asserted claims and causes of action that were or could have been brought therein. This Stipulation of Dismissal is signed by counsel for all parties who have appeared in this action. Plaintiff Rachel Crawford stipulates to the dismissal with prejudice of all claims and causes of action that were or could have been brought in this case against Defendant San Marcos Consolidated Independent School District and all current and former employees, agents, and representatives of the San Marcos Consolidated Independent School District, including but not limited to its Trustees, representatives, agents, attorneys, insurers, and employees, all in both their official and individual capacities, based on the factual allegations made in this case.

Plaintiff further stipulates to the dismissal of any cause of action that could have been based in whole or in part on any transactions, dealings or agreements between or among Plaintiff, Defendant San Marcos Consolidated Independent School District, and all current and former Trustees, representatives, agents, attorneys, insurers, and employees of the San Marcos Consolidated

Independent School District, all in both their official and individual capacities, which have occurred at any time up to the signing of this Stipulation of Dismissal with Prejudice.

Plaintiff stipulates to the dismissal with prejudice of all causes of action that were raised or could have been raised in this case based on the events which have occurred at any time up to the signing of this Stipulation of Dismissal with Prejudice. This Stipulation of Dismissal with Prejudice does not affect either party's claims, defenses, or entitlements in the case styled *Rachel Crawford v. San Marcos Consolidated Independent School District, et al.*, Civil Action No. 1:11-CV-415-LY, in the United States District Court, Western District of Texas, Austin Division unless the Court finds claims asserted in Civil Action No. 1:11-CV-415-LY should or could have been asserted in this case (Civil Action No. A-09-CA-649-LY). This Stipulation of Dismissal with Prejudice does not affect Defendant's assertion that the claims in Civil Action No. 1:11-CV-415-LY were released in a settlement agreement between the parties dated on or about June 21, 2007.

The parties will bear their own costs and attorneys' fees.

Respectfully submitted,

Cirkiel & Associates, P.C.

/s/ Martin J. Cirkiel

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ATTORNEYS FOR DEFENDANT SMCISD

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9<sup>th</sup> day of July, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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/s/Bridget Robinson  
Bridget Robinson